

DUANE MORRIS LLP

A Delaware Limited Liability Partnership

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Joseph H. Lemkin (JL-2490)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BANC OF AMERICA PRACTICE SOLUTIONS,
INC., as servicer for BANK OF AMERICA,
successor by merger and acquisition to MBNA
AMERICA (DELAWARE), N.A., assignee of Sky
Bank, and as agent for U.S. Bank Trust National
Association,

Plaintiff,

v.

WEST 86TH STREET DENTISTRY, PC AND
NKEMJIKA S. OBIECHINA, DMD,

Defendants.

Civil Action No. 1:07-cv-04752-LTS

TO: Nkemjika S. Obiechina, DMD and
West 86th Street Dentistry, PC
170 Jane Street
Englewood, NJ 07631

NOTICE OF MOTION FOR ENTRY OF DEFAULT JUDGMENT

PLEASE TAKE NOTICE that plaintiff, Banc of America Practice Solutions, Inc. (“BOA” or “Plaintiff”), by their undersigned counsel, Duane Morris LLP, will hereby move before this Court for an order pursuant to Fed. R. Civ. P. 55(b) granting plaintiffs’ motion for entry of default judgment in plaintiffs’ favor against defendants West 86th Street Dentistry, PC and Nkemjika Obiechina.

PLEASE TAKE FURTHER NOTICE that Plaintiff shall rely upon the Complaint filed commencing the within action, the affidavit of Joseph H. Lemkin, Esq. filed simultaneously herewith, the enclosed Clerk's Certificate, and the enclosed proof of service of the summons and complaint, in support of the within motion.

PLEASE TAKE FURTHER NOTICE that, answering papers, if any, shall be filed with the Clerk of this Court and served upon the undersigned counsel by no later then May 12, 2008, with reply papers due by no later then May 19, 2008.

Dated: Newark, New Jersey
April 28, 2008

Respectfully submitted,
DUANE MORRIS LLP

Dated: April 28, 2008

By: /s/ Joseph H. Lemkin
Joseph H. Lemkin
744 Broad Street
Newark, New Jersey 07102
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Attorneys for Plaintiff
Banc of America Practice Solutions, Inc.